

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

IN RE:

WOUNDER BAKER  
DEBTOR

BANKRUPTCY NO.: 22-12645-JDW  
CHAPTER 13

**RESPONSE TO OBJECTION TO CLAIM [DKT. 11]**

The United States of America-Internal Revenue Service (Service), by and through the United States Attorney's Office for the Northern District of Mississippi, responds to the Debtor's Objection to Claim [Dkt. 11] as follows:

1. The Service admits the allegations contained in Paragraph 1.
2. The Service denies the allegations contained in Paragraph 2. In response to the allegations contained in Paragraph 2, the Service alleges that the Debtor received total taxable distributions in the amount of \$27,964 (\$8,581.00 from ALIG and \$19,383.00 from FIRS) with a federal tax withholding amount of \$1,033.00.<sup>1</sup> As such, the Debtor's gross income exceeds the filing requirement amount for 2021 and the Debtor is required to file a federal tax return for the 2021 tax year.

3. The Service denies the allegations contained in Paragraph 3.

4. The Service denies the allegations contained in Paragraph 4.

For the last unnumbered paragraph beginning with "WHEREFORE", the Service denies that the Debtor has presented a valid objection to the Service's Proof of Claim. The Debtor's objection should be overruled.

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<sup>1</sup> The Service will provide Debtor's counsel with a copy of the Debtor's 2021 Wage and Income Transcript.

Respectfully submitted,

CLAY JOYNER  
United States Attorney

By: /s/ SAMUEL D. WRIGHT  
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CERTIFICATE OF SERVICE

I, SAMUEL D. WRIGHT, Assistant United States Attorney for the Northern District of Mississippi, hereby certify that I have electronically filed the foregoing Response to Objection to Claim [Dkt. 11] with the Clerk of the Court using the ECF system, which sent notification of such filing to the following:

- **Locke D. Barkley** Ecf\_lbarkley13@barkley13.com, lbarkley13@ecf.epiqsystems.com
- **Robert Hudson Lomenick** robert@northmsbankruptcy.com, r47860@notify.bestcase.com;jhhurdle13@gmail.com
- **John E. Tucker** jtucker@towerloan.com
- **U. S. Trustee** USTPRegion05.AB.ECF@usdoj.gov

This the 19th day of December, 2022.

/s/ SAMUEL D. WRIGHT  
SAMUEL D. WRIGHT  
Assistant United States Attorney